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UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In Re:

SCHULTE PROPERTIES LLC,

Debtor.

Case No. 18-12734-MKN
Chapter 11

DECLARATION OF MELANI SCHULTE IN RESPONSE TO SUPPLEMENTAL DECLARATION OF GREG CAMPBELL IN SUPPORT OF SHELLPOINT MORTGAGE SERVICING'S MOTION FOR PROTECTIVE ORDER OR, IN THE ALTERNATIVE, MOTION FOR MODIFICATION OF SUBPOENA [DKT NO. 862], SUPPLEMENTAL DECLARATION OF SHELLPOINT MORTGAGE SERVICING IN SUPPORT OF SHELLPOINT MORTGAGE SERVICING'S MOTION FOR PROTECTIVE ORDER OR, IN THE ALTERNATIVE, MOTION FOR MODIFICATION OF SUBPOENA [DKT NO. 862]

STATE OF NEVADA)
COUNTY OF CLARK) SS.

I, MELANI SCHULTE, declare under penalty of perjury as follows:

1. I am over the age of 18, am mentally competent, and have personal knowledge of the facts in this matter.

- 1 2. I am the sole managing member for the Debtor, Schulte Properties, LLC's ("Debtor"),
2 in the above-captioned action.
- 3 3. I make this Declaration in support of the *Debtor's Subpoena to Shellpoint Mortgage*
4 *Servicing ("Shellpoint")* and in opposition to *Shellpoint Mortgage Servicing*
5 *(("Shellpoint")) Motion For Protective Order, Supplemental Declaration Of Greg*
6 *Campbell Servicing In Support Of Shellpoint Mortgage Servicing's Motion For*
7 *Protective Order Or, In The Alternative, Motion For Modification Of Subpoena [Dkt*
8 *No. 862]*, and *Supplemental Declaration of Shellpoint Mortgage Servicing In Support*
9 *Of Shellpoint Mortgage Servicing's Motion For Protective Order Or, In The*
10 *Alternative, Motion For Modification Of Subpoena [Dkt No. 862]*
- 11 4. On or about May 28, 2021, the Debtor issued a *Subpoena To Produce Documents,*
12 *Information, Or Objects Or To Permit Inspection Of Premises In A Bankruptcy Case*
13 *(Or Adversary Proceeding) ("Subpoena")* to Shellpoint, requesting that Shellpoint
14 produce certain documents related to the Debtor.
- 15 5. I have carefully reviewed the documents with the Debtor's counsel, Matthew L.
16 Johnson. I have also reviewed his declaration. To the best of my knowledge and belief,
17 the assertions made in Mr. Johnson's declaration are true and correct, and the Debtor
18 has not received the documents described by Mr. Johnson in that declaration.
- 19 6. To the best of my knowledge, I have not received any of the requested documents for
20 the property located 5609 San Ardo Pl., Las Vegas, Nevada 8913, or documents related
21 to 8216 Peaceful Canyon Dr., Las Vegas, Nevada 89128. Although Shellpoint had the
22 loan these two properties for a short period of time, they should still have documents,
23 and to the best of my knowledge and belief, Shellpoint has not produced any documents
24 pertaining to these two properties.
- 25 7. I am respectfully requesting that the Court enter an Order enforcing the subpoena
26 requiring Shellpoint to provide, on disc or flash drive if possible, all of the documents
27 that have not been provided and that the Court require a representative of Shellpoint to

1 state under penalty of perjury that all of the documents have been provided. Finally, I
2 request that the documents be produced by year as opposed to jumbled so as to make it
3 costly and difficult. This information is necessary for the Debtor to evaluate and prepare
4 claim objections so that only those objections deemed appropriate may be filed by the
5 Debtor.

6 DATED: November 3, 2021


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8 MELANI SCHULTE

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